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AMERICAN CORRECTIVE COUNSELING  
SERVICES, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE BRANCH

ELENA DEL CAMPO, et al.

Plaintiffs,

vs.

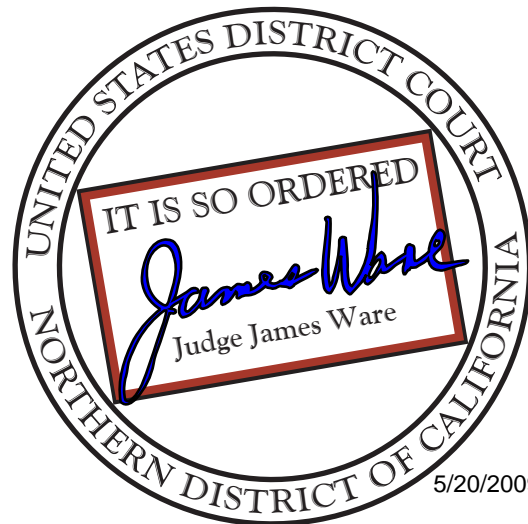
AMERICAN CORRECTIVE  
COUNSELING SERVICES, INC., et al.

Defendants.

No. C 01-21151 JW PVT

**STIPULATION IN SUPPORT OF NOTICE  
OF WITHDRAWAL AND REQUEST FOR  
AN ORDER PERMITTING  
WITHDRAWAL OF JENKINS GOODMAN  
NEUMAN & HAMILTON LLP AS  
COUNSEL OF RECORD FOR BANKRUPT  
DEFENDANT AMERICAN CORRECTIVE  
COUNSELING SERVICES, INC.  
PURSUANT TO LOCAL 11-5**

Plaintiff Elena del Campo and other similarly situated consumers (“Plaintiffs”),  
Defendant American Corrective Counseling Services, Inc. (“Defendant ACCS”), and



1 Defendants Don R. Mealing; Lynn R. Hasney; Fulfillment Unlimited, Inc.; Fundamental  
 2 Strategies and ACCS Administration, Inc. (“Mealing Defendants”), collectively referred to  
 3 herein as the “Parties”, through their counsel, hereby stipulate as follows:

4 1. Charles D. Jenkins (“Mr. Jenkins”) and Dan Day Kim (“Mr. Kim”) are  
 5 affiliated with Jenkins Goodman Neuman & Hamilton LLP (“JGNH”), which with other  
 6 counsel, currently serves as counsel of record for Defendant ACCS in the above entitled  
 7 action (“subject action”). JGNH, including Messrs. Jenkins and Kim, has represented  
 8 Defendant ACCS since 2002. Throughout this period of representation, Mr. Kim has  
 9 always been associated with JGNH and has never represented any party in the subject  
 10 action independent of his association with JGNH.

11 2. Paul Arons of the Law Offices of Paul Arons (“Mr. Arons”), among other  
 12 counsel, currently represents Plaintiffs in the subject action.

13 3. Hugh Verano of Verano & Verano (“Mr. Verano”) currently represents the  
 14 Mealing Defendants in the subject action. Mr. Verano first appeared as counsel of record  
 15 on or about December 8, 2008. At that time Mr. Verano appeared for the Mealing  
 16 Defendants only and substituted in for the Mealing Defendants’ former counsel, Ross  
 17 Dixon & Bell by Timothy Irving and Lindsey Reese. Mr. Verano has never and does not  
 18 currently represent Defendant ACCS in this action.

19 4. On or about January 19, 2009, Defendant ACCS filed for bankruptcy in the  
 20 Delaware Bankruptcy Court. JGNH, including Messrs. Jenkins and Kim, have sought to  
 21 withdraw as counsel of record for Defendant ACCS as set forth in the Notice of  
 22 Withdrawal And Request For An Order Permitting Withdrawal Of Jenkins Goodman  
 23 Neuman & Hamilton LLP As Counsel Of Record Pursuant To Local Rule 11-5 (“Notice  
 24 and Request”), filed on or about May 4, 2009 (Document No. 752).

25 5. Following said filing, it has come to the Parties’ attention that the Court’s  
 26

1 record inadvertently contains various inaccuracies concerning the representation of certain  
 2 parties; more specifically, what parties are currently represented by JGNH, including  
 3 Messrs. Jenkins and Kim. It is necessary for the Parties to clarify for the Court JGNH's  
 4 current representation in order for the Court to rule on JGNH's Notice and Request. This  
 5 stipulation is designed for that purpose.

6 6. The Parties are clear in their understanding and represent to this Court that:

7 a. Former Defendant Bruce Raye, the individual, is no longer a  
 8 defendant in the subject action. Plaintiffs did not name Mr. Raye as a defendant in  
 9 either of the Consolidated Complaints, filed on May 1, 2006 (Document No. 196) or  
 10 on December 12, 2006 (Document No. 283). Accordingly, JGNH is not counsel of  
 11 record for Mr. Raye and need not seek permission to withdraw from said  
 12 representation at this time.

13 b. JGNH, including Messrs. Jenkins and Kim, do not currently represent  
 14 any of the Mealing Defendants. JGNH, including Messrs. Jenkins and Kim,  
 15 currently only represents Defendant ACCS in the subject action. Accordingly, in  
 16 seeking permission to withdraw from representing any party in the subject action, it  
 17 is only from representation of Defendant ACCS that JGNH, including Messrs.  
 18 Jenkins and Kim, must seek permission from this Court to withdraw as counsel of  
 19 record.

20 7. Counsel for Plaintiffs and counsel for the Mealing Defendants do not object  
 21 to the withdrawal of JGNH, including Messrs. Jenkins and Kim, from its representation of  
 22 Defendant JGNH. Said withdrawal only impacts bankrupt Defendant ACCS, which is still  
 23 represented by McGuire Woods, LLP, and does not otherwise disturb the representation of  
 24

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1 any of the other parties in the subject action.

2  
3 SO STIPULATED:

4 The Law Offices of Paul Arons

5 Date: May 15, 2009

By: /s Paul Arons  
Paul Arons

7 Verano & Verano

9 Date: May 15, 2009

By: /s Hugh Verano  
Hugh Verano

12 Date: May 15, 2009

Jenkins Goodman Neuman & Hamilton LLP

14 By: /s Charles D. Jenkins  
Charles D. Jenkins

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18 **IT IS SO ORDERED:**

19 The Court GRANTS the Stipulation. The Motion to Withdraw (Docket Item No. 52) is found a MOOT.

20 Dated: May 20, 2009

21   
United States District Judge